

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|--------------------------------|---|--------------------|
| -----X | : | |
| PAULA BELL, | : | |
| | : | |
| Plaintiff, | : | |
| | : | 19 Civ. 8153 (LGS) |
| -against- | : | |
| | : | <u>ORDER</u> |
| SL GREEN REALTY CORP., et al., | : | |
| Defendants. | : | |
| -----X | : | |

LORNA G. SCHOFIELD, District Judge:

WHEREAS, by Order dated May 8, 2020, pro se Plaintiff was directed to file an Amended Complaint including further detail on the alleged discrimination, and Defendant SL Green Realty Corp. and Defendant Union Local 32BJ were granted leave to file their motions to dismiss after the Amended Complaint is filed. Pro se Plaintiff was also directed to provide a different address to attempt service on Defendant First Quality Maintenance;

WHEREAS, pro se Plaintiff filed an *ex parte* letter, providing further detail on the alleged discrimination, which attached letters filed with the initial Complaint (Dkt. No. 2, at pages 8-12). A copy of the letter and attachments is appended hereto. It is hereby

ORDERED that the *ex parte* letter shall be construed as supplementing the initial Complaint. Defendants SL Green Realty Corp. and Union Local 32BJ shall file their motions to dismiss the Complaint by **July 6, 2020**. If Plaintiff chooses to file an opposition, it shall be due **August 6, 2020**. If Plaintiff files an opposition, Defendants may file a reply by **August 13, 2020**. The opening and opposition briefs shall not exceed 25 pages, and any reply brief shall not exceed 10 pages. No paper courtesy copies are required per the Emergency Individual Rules and

Practices at <https://www.nysd.uscourts.gov/hon-lorna-g-schofield>.

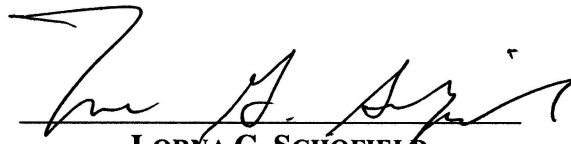
Pro se Plaintiff is advised that, in light of the current global health crisis, parties proceeding pro se are encouraged to submit all filings by email to Temporary_Pro_Se_Filing@nysd.uscourts.gov. Instructions for filing by email are located at <https://nysd.uscourts.gov/forms/instructions-filingdocuments-email>. Pro se parties also are encouraged to consent to receive all court documents electronically. A consent to electronic service form is available on the Court's website. Pro se parties who are unable to use email may submit documents by regular mail or in person at a drop box at one of the designated courthouse locations in Manhattan (500 Pearl Street) or White Plains (300 Quarropas Street). For more information, including instructions on this new email service for pro se parties, please visit the Court's website at nysd.uscourts.gov.

If pro se Plaintiff is mailing her brief, she is advised it *must be postmarked* by **August 6, 2020**. If pro se Plaintiff is delivering the brief in person at a drop box, it must arrive by **August 6, 2020**. It is further

ORDERED that pro se Plaintiff shall file a letter by **July 6, 2020**, indicating how she wishes to proceed with respect to Defendant First Quality Maintenance. Failure to do so will result in dismissal of Defendant First Quality Maintenance. It is further

ORDERED that by **June 17, 2020**, Defendants SL Green Realty Corp. and Union Local 32BJ shall email a copy of this Order to pro se Plaintiff and file proof of service on the docket.

Dated: June 15, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

To Whom It May Concern,

My name is Paula Bell and I was let go from my job due to my ethnic background. I am a Hispanic woman and Senada fired me for being Hispanic. While working at 420 Lexington, I witnessed Senada give preference to the people of her race and belittle the Hispanics at the workplace. She belittled me as a person of the Latino race,

As the shop steward for 420 Lexington, I was in charge of ensuring that all workers were treated with respect and given a safe and amicable work environment. To my face, Senada would tell me that I am a stupid shop steward. She would tell me that the maintenance workers do not need to listen to me because no Hispanic should be given attention to. She stated numerous times that instead, the workers need to only listen to her because she was mean to be an idol and no Hispanic was ever going to tell her what to do.

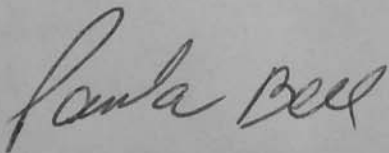
To punch in for work, the rule is all employees had to be in uniform. However, these rules were only followed with the Hispanic race, especially with me. If I did not have my uniform on or if I had my clothes under my uniform then I was not allowed to punch in. She would instruct me to go back and "properly" change into my uniform before being able to punch in. However, this was not the case with the employees of her race. There was favoritism. She only followed the rules for Hispanics. For the employees of her race, she allowed them to punch in however, whether with or without uniform on and there were no issues, only if you were Hispanic.

At times, Senada would call some employees down for a break and give them Snapples. I come to find out it was only the people of her race that her called down. All the Hispanics were left working while the others enjoyed time off cooling down with a Snapple. All she had to say in regards to the situation is "That's just the way it is." Senada would also make me kneel to clean certain things that clearly did not require a person to be kneeling. When I asked why she does this she responded, "That's what I have YOUR people for, not mine."

Senada made it her duty to get rid of the Hispanics little by little and have them replaced with a person of her preference, a person of her race. She got rid of them just like she did with me all because I am Hispanic and she thinks little of us. She believes her race is pure and above us all. She went as far as taking money away from us. The bonus' provided to employees were removed over time and they were then only given to people of her race. No Hispanic was receiving a bonus in the building.

I advise that all that is written in this letter is true. If witnesses are required please advise. Please feel free to speak to Humberto Cabrera who also was a victim of Senada. If further information is required, please do not hesitate to reach out to me. My cell phone is 917-501-1032.

Thank you,

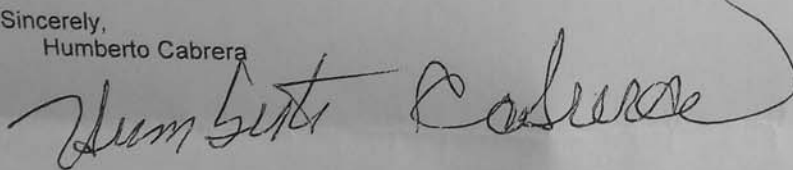
A handwritten signature in cursive script that reads "Paula Bell". The signature is written in dark ink and is positioned above the printed name.

Paula Bell

Nov. 13, 2015
Humberto Cabrera
590 West 17451
New York, NY, 10033
646.705.1821

I Humberto Cabrera as an employee of SLGreen for fourteens of which 4 of the years of my employment I spent working at 420 Lexington Avenue.
On Nov 13 2015 an incident took place with chemicals in the area in which I was working in on the 3rd floor. Mrs.Senada Secash came to my floor to scrub the bathroom with some products that cause some health issues for me. The products she was using to clean was causing me to have breathing problems. Mrs.Senada Secash called the union Shopsteward Mrs. Bell by phone so she could speak with me because I wasn't feeling well. When the Shopsteward arrived I was a bit aggravated and arguing with Mrs.Senada Secash because I was asking her what chemicals were in her mop bucket which caused me to have health issues. The Shopsteward asked what were the chemicals Mrs.Senada Secash mixed together to scrub the bathroom. Mrs.Senada Secash said she didn't have to tell us what she mixed together in the bucket. Our shopsteward asked me if I needed an ambulance. She didn't argue with anyone. She arrived and did her job as shopsteward of the union. Later on Mr.Leon Swarez arrived who acts as assistant shop steward when Mrs.Bell is on vacation. At no point during the events of Nov.13th was there a argument or fight between the Shopsteward Mrs.Bell or Mrs.Senada Secash. Only conversations pertaining to my health and wellbeing. There was no motive as to why they fired Mrs Bell on the 17th of November 2015. Mrs.Bell has done her job as shopsteward for our union and as worker for SLGreen and has always been very respectful in 420 Lexington. Even so a month before the event took place she was called to the management office with Mrs.Senada Secash to congratulate her on her good work. Everything written up, made up by Mrs.Senada Secash and Mr.LeonSuarez was fabricated out of hatred toward Mrs.Bell
Since the day Mrs.Secash arrived to work at 420 Lexington she said she didn't like Mrs.Bell and wouldn't rest till she got Mrs Bell fired from working at 420 Lexington Avenue. Through lies she's managed to get what she's wanted from the start.
Mrs Secash doesn't like people from other countries outside of that of her own.
Sadly to say our union 32BJ isn't offering the right assistance to help our union workers through these tough working conditions. Is allowing for more people under their employment to fall unemployed and evidently homeless.

Sincerely,
Humberto Cabrera



6/12/18

Dear Justice

I been in the building for 1 year and 3 months
During that time and still to this day I have witness
and experienced a lot of Discrimination and Racism
Harassment from my Supervisors Brian and Sanada

Favoritism from both Foreman and Floor lady
Eddie and Ala

I been micro managed harassed week after week
with my job for no reason adding more to my routine
Doing things that's not my job

They all discriminate only with ~~the~~ Hispanics
being unfair with the overtime not following union rules
ignoring Seniority

~~With holding~~ ~~with~~ With holding Christmas bonuses
~~from~~ not giving out location checks on time
~~seen~~ Brian Sexually harass Women Heard stories from
a co worker saying she's traumatized but afraid to come
forward thinking she can lose her job if she speak out

ADVISORY BOARD COMPANY
WASHINGTON, D.C.

If you wanna contact me for any more information
Feel free to give me a call here's my Cell Phone number
917-514-0026

JL

Jeremy Laboriel

Humberto Cabrera

646 705 1821

Dillon, Regional

917-558-0906

To whom this may concern,

My name is Alba Carrasco.

I work in the Coxauber building since 1995 and started working for B.L. Green since 1997. Address is 420 Lexington Ave.

The supervisor in this building are Brian and Sereda Cetaoj. Foreman/lady are Eddie and ala.

I have personally witnessed in this building a lot of favoritism, harassment, racism, and if you complain even retaliation. one of the supervisors Brian all he does is Scream and belittle you, when he talks to you. He personality has called me names.

I have witnessed him in a women's meeting locker room by the doorway, put his hand inside Paola Bella's uniform dress pocket.

Brian has harassed me and in this job plenty of times. he has told me to move furniture because he said so.

My job is to do general cleaning, which consists of high dust, low dust, vacuum, wipe down desk, wipe down chairs.

Senada Cehaj, the second supervisor well
she made the workplace unbearable.

Consistently ~~has~~ harassing me by make me
get down on my knees to do things that
are not evenⁱⁿ my job title.

Constantly behind me, checking my work every
week. Saying the suites were complaining
about me. I would ask my tenants if
they had complaint, there response were no.

She'll write me up. Suspend me and in
till ~~she~~ she got me fired.

She said I was stealing companies time
and she fired me for that.

I'm not the only one she would be after
basically it was all the hispanics.

Alba Carrasco
347-435-6695